

2. No party has yet to serve discovery, no depositions taken, and a scheduling order has not yet been entered.

3. Counsel needs to withdraw for multiple reasons including family health issues that will impede, if not prohibit, his ability to serve Dalio. In more than 30 years as a licensed attorney, Choslovsky cannot recall ever seeking to withdraw from a case.

4. Dalio consents and agrees to William Choslovsky of the law firm of Ginsberg Jacobs withdrawing as its attorney of record in this matter. Neither the debtor (Texas REIT) nor plaintiff (WCW) oppose the motion.

5. This Motion is not sought for the purposes of delay.

6. Other counsel has already appeared for Dalio in the bankruptcy case, and Dalio is prepared to hire additional counsel to represent its interests in the adversary case with minimal delay or disruption to this case. Existing counsel for Dalio in the bankruptcy case are Joseph Colvin, Jr. and Lori Hood, Shackelford Law, 717 Texas Avenue, 27th Floor, Houston, Texas, 77002. Any delay will be minimal and not disruptive to the overall bankruptcy case since the instant adversary case is dependent on the underlying properties being sold, which has yet to occur.

7. A copy of this motion bearing the enclosed notice has been delivered to the last known address of Defendant Dalio: 2425 West Loop South, Suite 1100, Houston, Texas 77027; Phone: (281) 630-6627; ali@jetallcapital.com.

PRAYER

Wherefore, premises considered, Movants pray that the Court enters an order discharging Movants as attorney of record for Dalio Holdings I, LLC and Dalio Holdings II, LLC, and any other relief to which it may be justly entitled.

Dated: February 21, 2025

GINSBERG JACOBS LLC

/s/ William Choslovsky
William Choslovsky
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*Counsel for Dalio Holdings I, LLC and
Dalio Holdings II, LLC*

CERTIFICATE OF CONFERENCE

I hereby certify that on February 14, 2025, I conferred with Plaintiff's counsel and Debtor's counsel, and they do not oppose the motion.

/s/ William Choslovsky
William Choslovsky

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2025, a true and correct copy of the foregoing Motion for Withdrawal was electronically served on the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ William Choslovsky
William Choslovsky